

I

First off, I'd like to thank Davis Gloff, former air personality at the former WQRS 105.1 Detroit, for submitting comments in this proceeding. The demise of the classical format on FM radio in Detroit is a very prime example of why localism is important, and serving the community is important. The station on that frequency has gone through three format changes since, and this after nearly 40 years airing classical music, which is definitely a public service to any community the format runs in, both to the listeners, and to music educators. I hope that someone in the Detroit media wakes up and smells the coffee, and returns the classical format to the air there.

Now to my comments.

Localism in radio is very important to me. I worked at KXCI Tucson, in the 1980s (I suggested those calls, and the commission accepted and assigned them to the licensee). Among other things, we kept a bulletin board up with all the comments that listeners mailed in. Even if the letter said 'More pumk, dammit!' three times, it was up there. We kept a very extensive public inspection file, which I viewed on several occasions, and it was above and beyond the call, but was very informative on how the station I was volunteering at was seen by the community. Public inspection files need to be more like that, in my opinion, and I ask the commission to consider ways to make that more inclusive of comments, or rather, require more from the licensee as far as this item is concerned.

As for formats in radio, they change like the weather. As mentioned above, the owners of WQRS changed from classical to hard alternative in 1997 without warning and to a substantial outcry from the listeners there, and they went from 'Madame Butterfly' to Nine Inch Nails without as much as a word. Even WUOM Ann Arbor now airs a cookie-cutter NPR format that has little regard for the educational needs of the listeners in the Detroit/Flint listening areas.

I propose that the Commission designate one high powered (or as high a power is available to that community presently in the Table of Allotments, by regional means, a 'Fine Arts' channel to each DMA and where necessary to rural areas. That will make this valuable educational service available to students, music teachers, and others who simply enjoy classical music. If anyone has further comments on this, please respond. I will respond as soon as I see the comments filed online via the ECFS system.

II

Localism in the Salt Lake market.

The Salt Lake market, next to Honolulu Hawaii, has the most full-power transmitters available to it than any other market in the US, but darn few outside of a couple of Salt Lake stations ever programs to their City of License. I will detail this below, FM stations first.

88.1 KWCR Ogden. College station. Runs some PSAs for local community groups, is only station here that does. One hip-hop program seems to get extensive listener interaction from the two jails in the city.

88.1 KPGR Pleasant Grove. This station, operated by Pleasant Grove HS, is more of a laboratory than a full broadcast outlet, but they do air school football and basketball games when in season.

88.3 KCPW Salt Lake. NPR affiliate that does have some local programming. Very good local stuff, but not nearly enough, or an educational focus either.

88.3 (translator for KAWZ Twin Falls) Provo. Distant 'satellator'. Maybe five minutes of news a day, no PSAs except for church service info in Twin Falls, and similar at the end of broadcasts, no public affairs programming for Twin Falls Idaho at all. Have never heard any public affairs programming on the parent no matter where the translator is.

88.7 KNKL North Ogden. Owned by Educational Media Foundation, with two translators, the programming originates exclusively from their Rocklin CA studios. No local content whatsoever on any K-Love station anywhere I've found translators or full-power stations. No PSAs, but occasional fundraising for ministries and a homeless-shelter Thanksgiving Day dinner, etc., darn little else.

89.1 KBYU Provo. The best of the educational stations here. Clearly has an educational and community focus. Airs educational programs on classical music, tells about the music, and airs a public service program (although they don't call it that) called 'Living Essentials'. News is frequent and thorough, they air programming produced at BYU and is tailored for the local community. Works with other fine arts organizations as well, airing the Utah Opera three times yearly, etc. Far too numerous are the things they do to serve their City of License and still serve the region.

90.1 KUER Salt Lake. Not as good as KBYU, but otherwise is quite close to them. 'Radio West' is their local star program, and they do air a lot of local news, but everything else, save the jazz music, is cookie-cutter national NPR programming. They have 30 translators but do no classical programming to the rest of the state. (Note: KBYU has some translator applications pending, but none granted yet, to fill the void). They dropped the classical programming they did have gradually until it was all gone by March of 2001.

90.9 KRCL Salt Lake. Very responsive local programmer, very responsive to listener needs and also does extensive public affairs programming, some not found elsewhere on the dial. A community station from their startup in 1979, they have not lost their focus on the community from that day to this.

91.3 (Translator for KYCC Stockton). Religious broadcaster that despite having distant translators does serve Stockton CA well. Good local/national public affairs programming, including especially 'Front Page'.

91.7 KUFR Salt Lake. Owned by Family Stations, darn little local programming, maybe some announcements but that's all, Network has K220EI Ogden but that rebroadcasts KEAR San Francisco instead of the local licensed O&O.

91.7 KOHS Orem. Another 'laboratory' NCE. Alternative music format, run largely by the students taking the radio program at Orem High School.

92.1/92.3 KUUU/KTCE (moving to 92.5/92.1 per docket 02-14 shortly). Utah's first urban station. No local content aimed at Tooele since sign-on of format in 1999. No local content aimed at Payson on KTCE since then either. News is cookie-cutter for the market, no local public affairs either from these stations.

93.3 KUBL Salt Lake. First of major 'Class C' commercial FMs. Little news, public affairs program is cookie-cutter for entire cluster owned by Citadel. Aired so early Sunday morning few listen to it. This can be said for all Citadel, Clear channel, Bonneville, and other commercial FMs. They don't serve the actual community of license if other than Salt Lake but rarely.

94.1 KODJ Salt Lake. Ditto (Clear Channel owned).

94.9 KHTB Provo (3 Point owned) Ditto.

95.5 KYFO Ogden. Satellite format, only local station ID maybe some PSA's now and again, no local public affairs, licensed as an NCE-FM.

95.9 KMGR Delta. Not on air presently as far as new transmitter goes, will rimshot into Utah County well, and will likely abandon Delta which is its community of license.

96.3 KXRK Provo. No content aimed at Provo except for some local music aired on Sunday night by local bands.

96.7 KCFM Levan. Spanish station, very locally focused to Provo, not Levan. Making change to 'rimshot' into Provo better, due to row with Forest Service. See Docket 04-258 for info.

97.1 KZHT Salt Lake. Little news.

97.9 KBZN Ogden. No local content except for some ads for Ogden businesses.

98.3 (Translator for KVFX Logan). Despite being a 'rimshot', this translator actually carries a local station that is locally focused on Logan rather than Salt Lake. Local sports from the University and some HS sports, local ads (few if ever from Salt Lake). Little public affairs but some but very little local Cache Valley news. Have yet to uncover the public affairs programming.

98.3 (Translator for KLGL Richfield, Provo). Very locally focused FM aimed at Richfield, translator was inserted here out of a desire to keep others who have to do business down there informed. Good local Sunday music show, other things, including HS sports extensively during the fall/winter months. Local PSAs run frequently for Sanpete, Sevier, and other nearby rural counties.

98.7 KBEE Salt Lake. Cookie cutter pop format, little public affairs except for that previously described.

99.1 KURR Bountiful. No local news/public affairs for Bountiful, a city of about 30,000 these days.

100.3 KSFI Salt Lake. Market leader on FM, runs local music show all day (6am-6pm Sunday, not 4am-midnight like the KLGL translator--these times don't matter as much as that they are locally focused musically these times). Local SL news, but market-wide otherwise. Local owner now, so they are more responsive than when Simmons owned them.

100.7 KJQN Brigham City (rulemaking to move to Woodruff per Docket 02-231). No local content for Brigham City, likely not to be for Woodruff either. Little news, etc., otherwise.

100.1 KBER Ogden. No local content for Ogden.

101.5 KEGA Oakley. No local content for valleys behind Wasatch Front, all targeted at Salt Lake.

101.9 KPQP Ogden. Recently changed format, too early to tell if the new owner will serve the community of license properly yet.

102.3 KDUT Randolph. First ever ethnic (regional Mexican) FM for this market. Station has never served its community of license. However, they are being responsive to the Salt Lake area Hispanic community by airing the regional Mexican format.

102.7 KQMB Midvale. Locally owned but not responsive to Midvale residents (about 27,000).

103.1 KPEB Coalville. Recently signed on and does not serve Coalville. Retransmits KJQN Brigham City as a 'rimshotter' at present. Not expected to target community of license at all.

103.5 KRSP. Locally owned, but not alot of local content other than the fact that they are owned and operated here.

103.9 KUDE Nephi. Transmitter is behind the mountain that is between it and its community of license. 'rimshot' rebroadcasts another station and does not serve Nephi, an incorporated community of about 2,000 persons. Has not since Millcreek/3 Point Media bought it. Was very local before that.

104.3 KSOP Salt Lake. Station is locally focused, with some very good and useful public affairs programming, has had same owner since sign-on in the 60s and they are very responsive to listeners.

105.1 KNJQ Manti. Station was owned by same owner as KLGL until 2002, but has never done any local programming for Manti since the new owners (Millcreek/3 Point) took control December 29, 2002. Was very locally focused, to the extent that when the town had its 'Mormon Miracle Pageant', which is a very large regional draw of tens of thousands a night to a small town of maybe 2,000 they gave traffic and parking info to the visitors, and that was helpful even to those who did not attend that. Was also known for airing many of the games that KLGL does now. Rimshots into Utah County via boosters.

105.7 KCPX Centerville. Licensed to smaller town in Davis county, Utah, no local content.

106.1 KOTB Evanston. Will not serve community of license once class C facilities are signed on. Spanish-language format planned by owner.

106.5 KOSY Spanish Fork. Only airs local music program that is similar to KSFI's program on Sunday. Otherwise has not served Spanish Fork since class upgrade in 1984.

106.9 Brigham City. Format change pending, ownership change was recent, hard to tell if they will do anything local.

107.5 KENZ Orem. Hasn't served Orem since class upgrade in 1982.

107.9 KUDD Roy. Not locally focused, rimshotter. Considered 'main' for programming purposes to KUDE Nephi above.

AM Stations.

570 KNRS. News/talk format, appears to be all national.

630 KTKK. Only news/talker to be almost all local. Controversial as well, no ratings.

700 KALL North Salt Lake. Another national news/talker, few local programs.

730 KSVN (Kaysville?). Owned by national broadcaster, has done local public affairs in the past and may still be doing so. Hampered in winter by weak signal in getting that program out.

800 KSOS Brigham city. Will be signed off soon on account of co-owned station in the 'ex-band' on 1660, KXOL.

860 KKAT Salt Lake. Checkered past, had local music format for four years 1985-1989 until Citadel took format off air. Has had problems gaining an audience share ever since. Hardly any local news, music programming fed from Jones Radio Networks.

910 KWDZ Salt Lake. Some local announcements, but all programming is from ABC/Disney in Los Angeles.

960 KOVO Provo. Owner wants to move station from Provo, does not air much local programming save Provo Angels baseball.

1010 KIQN Tooele, off air, ownership change and change from commercial to NCE following bankruptcy court sale.

1060 KDYL South Salt Lake. Is locally owned and focused. Mostly satellite feed from Westwood One. Has local morning/evening drive programming and a couple of specialty shows.

1120 KANN Roy. Has more local announcements than any of the other religious stations, save KEYY below. Programming otherwise originates from KILA Las Vegas.

1160 KSL Salt Lake. Has deteriorated of late, but still does much for the local community both public affairs and programming wise.

1230 KJQS Murray. All-sports, Salt Lake Stingers games.

1280 KZNS Salt Lake. All-sports, almost similar to KOVO except for Salt Lake market.

1320 KFNZ Salt Lake. Airs Utah Jazz basketball. But like all the 'all-sports' stations, does little public affairs, etc.

1370 KSOP South Salt Lake. See KSOP above in the FM stations.

1400 KSRR Provo. Local music Sundays, soft AC rest of week. Local program weekday mornings but is spotty as far as value.

1430 KLO Ogden. News/talk, largely national shows.

1480 KHQN Spanish Fork. regional Mexican station, was hare krishna station until recently, Spanish station is very locally focused.

1490 KYFO Ogden. Station up for sale, transaction pending, otherwise see KYFO in FM above.

1510 KLLB West Jordan. Very locally focused both format and public service-wise. Original owner of black gospel format was a very community minded individual and gave a care about the station and what it did.

1550 KMRI West Valley City. In state of flux due to rumors that Three Angels broadcasting may be in talks to buy it. Hard to tell what they are doing.

1600 KSGO Centerville. Spanish station, recent ownership change, hard to tell here either.

1640 KBJA Sandy. Hard to tell here, ex-band station.

1660 KXOL Brigham City. Ditto, ex-band station, see KSOS.

III

Requested actions.

1. Require broadcasters to seek out advertisers that are local to the community of license.
2. Require broadcasters to dedicate a certain percentage of air time to local commercials and programs aimed specifically at the communities of license between 7am and 10pm daily.
3. Set up an assignment table to set aside one FM channel, commercial or noncommercial, in each DMA to provide Fine Arts and classical music programming 20 hours minimum a day, this will not interfere otherwise with anyone else's business and format decisions, but will provide this educational service to everyone without them having to buy expensive satellite radio equipment. Make assignments where necessary on a regional basis to cover rural areas, and designate some translators to carry a fine arts station on a 'fill-in' basis where needed.

IV

I reserve the right to make additional comments in this proceeding as deemed necessary during the filing window.

James W. Anderson